

1 LESLIE MARK STOVALL, ESQ.
2 Nevada Bar No. 2566
3 ROSS MOYNIHAN, ESQ.
4 Nevada Bar No. 11848
5 STOVALL & ASSOCIATES
6 2301 Palomino Lane
7 Las Vegas, NV 89107
8 Telephone: (702) 258-3034
9 E-service: court@lesstovall.com
10 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 KATHRYN MAYORGA, an individual

Case No.: 2:19-cv-00168-JAD-DJA

12 Plaintiff

13 | vs

14 CRISTIANO RONALDO, individually,
15 Does I-XX and Roe Corporations I-XX;
Defendants.

PLAINTIFF'S MOTION TO EXTEND TIME TO REPLY

TO DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR IN CAMERA

REVIEW OF THE FOOTBALL LEAKS DOCUMENTS TO DETERMINE WHETHER

THE CRIME FRAUD EXCEPTION APPLIES [ECF NO. 124]

(Second Request)

23 COMES NOW Plaintiff, by and through her attorneys, STOVALL & ASSOCIATES, and
24 files this motion to extend time to reply to defendant's response to plaintiff's motion for in
25 camera review of the Football Leaks documents to determine whether the crime fraud exception
26 applies [ECF NO. 124]. This is the second request for an extension of time made to the court.
27

This motion is based upon the pleadings and papers on file herein, the memorandum of points and authorities attached hereto, and any oral argument this Court may entertain should there be a hearing on the motion.

Dated this 1 day of September, 2021.

STOVALL & ASSOCIATES

John

LESLIE MARK STOVALL, ESQ.
Nevada Bar No. 2566
ROSS MOYNIHAN, ESQ.
Nevada Bar No. 11848
2301 Palomino Lane
Las Vegas, NV 89107
Telephone: (702) 258-3034
E-service: court@lesstovall.com
Attorney for Plaintiff

DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF
PLAINTIFF'S MOTION TO EXTEND TIME

LESLIE MARK STOVALL, declares and states as follows:

1. I am the attorney of record for the plaintiff in this case.
2. On July 7, 2021 the plaintiff filed motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124].
3. On July 28, 2021 the parties agreed to extend the time for defendant to file replies and opposition re: [ECF NOS. 111, 113, 123, 124 and 126] (First Request)
4. The parties agreed that the deadline for plaintiff's reply to defendant's response to plaintiff's motion for in camera review of the Football Leaks documents to

1 determine whether the crime fraud exception applies [ECF NO. 124] shall be
2 extended from August 25, 2021 to September 1, 2021.

3 5. On August 18, 2021 Defendant filed his response to plaintiff's motion for in
4 camera review of the Football Leaks documents to determine whether the crime
5 fraud exception applies [ECF NO. 124]

6 6. On August 19, 2021 counsel for plaintiff email counsel Kendelee Works, Esq.
7 requesting an extension of time for plaintiff to file her reply from August 25, 2021
8 to September 9, 2021 due counsel for plaintiff being scheduled out of jurisdiction
9 until September 1, 2021.

10 7. On August 19, 2021 counsel for defendant email plaintiff's counsel a blank email
11 with the July 28, 2021 filed stipulation attached which was granted with an
12 extension of time for plaintiff to file her reply from August 25, 2021 to September
13 1, 2021.

14 8. On August 20, 2021 plaintiff's counsel email Ms. Works to request an additional
15 time for plaintiff to file her reply from September 1, 2021 to September 9, 2021
16 due to counsel for plaintiff scheduled out of jurisdiction. Counsel for defendant
17 did not respond.

18 9. I am requesting an extension of time to file plaintiff's reply to defendant's
19 response to plaintiff's motion for in camera review of the Football Leaks
20 documents to determine whether the crime fraud exception applies [ECF NO.
21 124] because I have not been able to begin work on the reply due to my office's
22 back log since my return from out of the country.

23 10. I am requesting that the court extend the time for the filing of the plaintiff's reply
24 to defendant's response to plaintiff's motion for in camera review of the Football
25
26
27
28

1 Leaks documents to determine whether the crime fraud exception applies [ECF
2 NO. 124] from September 1, 2021 to September 14, 2021.

3 11. This motion is made in good faith and not for propose of unnecessary delay.
4

5 I declare under penalty of perjury under the laws of Nevada that the foregoing is
6 true and correct.

7 DATED this 14 day of September, 2021.



8
9 LESLIE MARK STOVALL, ESQ.
10

11 MEMORANDUM OF POINTS AND AUTHORITIES

12 FRCP 6(b) states:

13 When an act may or must be done within a specific time. The court may, for good cause,
14 extend the time:

15 (A) with or without motion or notice if the courts acts, or if a request is made, before
16 the original time or its extension expires; or
17 (B) on motion made after the time has expired if the party failed to act because of
excusable neglect.

18 LRIA6-1 states in pertinent part:

19 (a) A motion or stipulation to extend dime must state the reasons for the extension
20 requested and must inform the court of all previous extension of the subject
deadline the court granted.
21 (b) A stipulation or motion to seeking to extend the time to file an opposition or reply
22 to a motion, or to extend the time fixed for hearing a motion, must state in its
23 opening paragraph the filing date of the subject motion or the date of the subject
hearing.

24 Based upon the declaration of counsel, good cause exists for the extension of plaintiff's
25 time from September 1, 2021 to September 14, 2021 to reply to defendant's response to
26 plaintiff's motion for in camera review of the Football Leaks documents to determine whether
27 the crime fraud exception applies [ECF NO. 124].
28

1 Case No.: 2:19-cv-00168-JAD-DJA
2 Mayorga v. Ronaldo
3 Motion to Extend time

4 DATED this 1 day of September, 2021.

5 STOVALL & ASSOCIATES



6
7 LESLIE MARK STOVALL, ESQ.
8 Nevada Bar No. 2566
9 ROSS MOYNIHAN, ESQ.
10 Nevada Bar No. 11848
11 STOVALL & ASSOCIATES
12 2301 Palomino Lane
13 Las Vegas, NV 89107
14 Telephone: (702) 258-3034
15 E-service: court@lesstovall.com
16 Attorney for Plaintiff
17
18
19
20
21
22
23
24
25
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 1st day of September, 2021, service of the foregoing
3 Plaintiff's Motion to Extend Time to reply to defendant's response to plaintiff's motion for in
4 camera review of the Football Leaks documents to determine whether the crime fraud exception
5 applies [ECF NO. 124] was made this date through the court's electronic filing system to the
6 following:

7 Christiansen Trial Lawyers
8 710 South 7th Street, Suite B
9 Las Vegas, NV 89101
10 Phone (702) 240-7979
11 Fax (866) 412-6992
12 Attorneys for the defendant

13
14 */s/ Maria Hernandez*
15 An employee of STOVALL & ASSOCIATES

26
27
28